

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER ALLAN BODEN, a/k/a "Captain,"
LEESA BETH VOGT, a/k/a "Lis Bokt,"
a/k/a "Moose," and
DANIEL REYNOLD DEJAGER,
a/k/a "Daniel Reynold," a/k/a "Daniel Miester,"
a/k/a "Danichi,"

No. 1:20-cr-40

**INDICTMENT
PENALTY SHEET**

Defendants.

/

CHRISTOPHER ALLAN BODEN

**COUNT 1: Conspiracy to Operate an Unlicensed Money Transmitting Business - 18 U.S.C.
§§ 371, 1960**

Maximum penalty: Not more than 5 years' imprisonment and/or \$250,000 fine [18 U.S.C.
§ 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class D Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNT 2: Operating an Unlicensed Money Transmitting Business - 18 U.S.C. § 1960

Maximum penalty: Not more than 5 years' imprisonment and/or \$250,000 fine [18 U.S.C.
§ 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class D Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNT 3: Conspiracy to Launder Money - 18 U.S.C. § 1956(h)

Maximum penalty: Not more than 20 years' imprisonment and/or not more than a \$500,000 fine, or twice the value of the monetary instrument or funds involved, whichever is greater

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 4-14: Money Laundering - 18 U.S.C. § 1956(a)(1)(A)(i), (B)(i)

Maximum penalty: Not more than 20 years' imprisonment and/or not more than a \$500,000 fine, or twice the value of the property involved, whichever is greater

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 15-17: Money Laundering - 18 U.S.C. § 1956(a)(3)(B)

Maximum penalty: Not more than 20 years' imprisonment and/or a \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 19-27: Structuring - 31 U.S.C. § 5324(a)(3), (d)

Maximum penalty: Not more than 10 years' imprisonment and/or a \$500,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNT 28: Attempted Collection of Debt by Extortionate Means - 18 U.S.C. § 894(a)(1)

Maximum penalty: Not more than 20 years' imprisonment and/or a \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

FORFEITURE

LEESA BETH VOGT

COUNT 1: Conspiracy to Operate an Unlicensed Money Transmitting Business - 18 U.S.C. §§ 371, 1960

Maximum penalty: Not more than 5 years' imprisonment and/or \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class D Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNT 2: Operating an Unlicensed Money Transmitting Business - 18 U.S.C. § 1960

Maximum penalty: Not more than 5 years' imprisonment and/or \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class D Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 18-23, 25, 27: Structuring - 31 U.S.C. § 5324(a)(3), (d)

Maximum penalty: Not more than 10 years' imprisonment and/or a \$500,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

FORFEITURE

DANIEL REYNOLD DEJAGER

COUNT 1: Conspiracy to Operate an Unlicensed Money Transmitting Business - 18 U.S.C. §§ 371, 1960

Maximum penalty: Not more than 5 years' imprisonment and/or \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class D Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNT 2: Operating an Unlicensed Money Transmitting Business - 18 U.S.C. § 1960

Maximum penalty: Not more than 5 years' imprisonment and/or \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class D Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNT 3: Conspiracy to Launder Money - 18 U.S.C. § 1956(h)

Maximum penalty: Not more than 20 years' imprisonment and/or not more than a \$500,000 fine, or twice the value of the monetary instrument or funds involved, whichever is greater

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 4-14: Money Laundering - 18 U.S.C. § 1956(a)(1)(A)(i), (B)(i)

Maximum penalty: Not more than 20 years' imprisonment and/or not more than a \$500,000 fine, or twice the value of the property involved, whichever is greater

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)]
[Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 15-16: Money Laundering - 18 U.S.C. § 1956(a)(3)(B)

Maximum penalty: Not more than 20 years' imprisonment and/or a \$250,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)] [Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

COUNTS 18-23, 25, 26: Structuring - 31 U.S.C. § 5324(a)(3), (d)

Maximum penalty: Not more than 10 years' imprisonment and/or a \$500,000 fine [18 U.S.C. § 3571(b)(3)]

Supervised Release: Not more than 3 years [18 U.S.C. § 3583(b)] [Class C Felony, 18 U.S.C. § 3559]

Special Assessment: \$100 [18 U.S.C. § 3013]

FORFEITURE

Dated: February 25, 2021

/s/ Justin M. Presant
Counsel for the United States

Submitted in accordance with Admin Order 17-MS-046